

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIQAFAR WAGAFE and MEHDI  
OSTADHASSAN on behalf of themselves  
and others similarly situated,

Plaintiffs,

v.

DONALD TRUMP, President of the  
United States; UNITED STATES  
CITIZENSHIP AND IMMIGRATION  
SERVICES; JOHN F. KELLY, in his  
official capacity as Secretary of the U.S.  
Department of Homeland Security; LORI  
SCIALABBA, in her official capacity as  
Acting Director of the U.S. Citizenship and  
Immigration Services; MATTHEW D.  
EMRICH, in his official capacity as  
Associate Director of the Fraud Detection  
and National Security Directorate of the  
U.S. Citizenship and Immigration Services;  
DANIEL RENAUD, in his official  
capacity as Associate Director of the Field  
Operations Directorate of the U.S.  
Citizenship and Immigration Services,

Defendants.

No. 17-cv-00094 JCC

**DECLARATION TRINA REALMUTO IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR CLASS CERTIFICATION**

Trina Realmuto declares as follows:

1. I am one of the attorneys for plaintiffs in this case. I have personal knowledge of  
the facts set forth herein and am competent to testify thereto.

DECLARATION OF TRINA REALMUTO  
(No. 17-cv-00094 JCC) – 1

NORTHWEST IMMIGRANT RIGHTS PROJECT  
615 Second Ave., Ste. 400  
Seattle, WA 98104  
Tel. (206) 957-8611

1           2.       I was admitted to the New York and California bars in 1998 and 1999,  
2 respectively, after graduating from Albany Law School of Union University in 1997. I am  
3 admitted to practice before the courts of the States of New York and California, the United States  
4 District Courts for the Southern and Eastern Districts of New York, the United States District  
5 Courts for the Northern, Southern, Eastern and Central Districts of California, the United States  
6 District Court for the District of Connecticut, the United States District Court for the District of  
7 Vermont as well as the United States Courts of Appeals for the First, Second, Third, Fourth,  
8 Fifth, Sixth, Seventh, Eighth, Ninth, Tenth and Eleventh Circuits, and the U.S. Supreme Court.

9           3.       I began working in immigration law first, in 1997, as an associate attorney at the  
10 law firm of Van Der Hout & Brigagliano (now Van Der Hout, Brigagliano & Nightingale LLP),  
11 later as an attorney consultant to the American Immigration Law Foundation (now the American  
12 Immigration Council), and, since 2009, as a Staff Attorney and now Litigation Director for the  
13 National Immigration Project of the National Lawyers Guild.

14           4.       I have litigated or am litigating cases on behalf of noncitizens before the  
15 immigration court in San Francisco, California, the Board of Immigration Appeals, federal  
16 district courts in the Northern, Southern, and Eastern Districts of California, the District of  
17 Connecticut, the Northern District of Georgia (*pro hac vice*), the Southern District of Texas (*pro*  
18 *hac vice*), the District of Columbia (*pro hac vice*), the Middle District of Tennessee (*pro hac*  
19 *vice*), the District of Vermont (*pro hac vice*), and the Western District of Washington (*pro hac*  
20 *vice*).

21           5.       I have litigated or am litigating cases on behalf of organizational plaintiffs before  
22 the federal district courts in the Southern District of New York, the District of Massachusetts  
23 (*pro hac vice*), and the District of Columbia (*pro hac vice*). I have litigated or am litigating cases  
24 on behalf of *amicus curiae* before the Board of Immigration Appeals, several federal district  
25 courts, the U.S. Courts of Appeals for the First, Second, Third, Fourth, Fifth, Sixth, Seventh,  
26 Eighth, Ninth, Tenth and Eleventh Circuits, and the U.S. Supreme Court.

6. I also have class action litigation experience. *See Duran Gonzales v. U.S. Department of Homeland Sec.*, 712 F.3d 1271 (9th Cir. 2013) (circuit-wide certification); *Brown v. U.S. Customs and Border Protection*, Case No. 3:15-cv-01181-JD (N.D. Cal.) (settled prior to decision on certification); *Mendez Rojas v. Johnson*, No. 2:16-cv-01024-RSM (W.D. Wash.) (nationwide certification).

7. In 2015, the American Immigration Lawyers Association awarded me the Jack Wasserman Memorial Award for Excellence in Litigation.

8. Co-counsel with me on this case is Kristin Macleod-Ball, a litigation attorney at NIPNLG whose practice focuses on civil litigation on behalf of immigrants. I have supervised Ms. Macleod-Ball since she joined NIPNLG in September of 2016. Presently, she is class counsel in two suits: *J.E.F.M. v. Lynch*, No. 2:14-cv-01026-TSZ, 2016 U.S. Dist. LEXIS 82653 (W.D. Wash. Jun. 24, 2016) (circuit-wide certification) and *Mendez Rojas v. Johnson*, No. 2:16-cv-01024-RSM (W.D. Wash.) (nationwide certification). Ms. Macleod-Ball graduated from Yale Law School in 2012.

9. Ms. Macleod-Ball and I are also counsel in *Ali v. Trump*, No.: 2:17-cv- 00135-JLR (W.D. Wash.), a putative class action on behalf of U.S. citizen and LPR visa petitioners and immigrant visa beneficiaries impacted by the Executive Order barring entry to the U.S. by citizens and nationals of Iraq, Iran, Libya, Somalia, Sudan, Syria and Yemen.

10. Neither the National Immigration Project of the National Lawyers Guild nor I are receiving reimbursement from any individual plaintiff or class member in this case. Together with co-counsel, I will fairly and adequately protect the interests of the individual plaintiffs and the proposed classes and possess the commitment and resources to prosecute the case as a class action.

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1 I declare under penalty of perjury that the foregoing is true and correct.

2  
3 DATED this 9th day of February, 2017, at Boston, Massachusetts.

4 /s/ Trina Realmuto  
5 Trina Realmuto

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DECLARATION OF TRINA REALMUTO  
(No. 17-cv-00094 JCC) – 4

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the dated indicated below, I caused service of the foregoing DECLARATION OF TRINA REALMUTO IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

via the CM/ECF system that will automatically send notice of such filing to all counsel of record herein.

DATED this 9th day of February, 2017, at Seattle, Washington.

By: s/ David A. Perez  
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